

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:22-cr-00084-SI

v.

PROTECTIVE ORDER

TONY DANIEL KLEIN,

Defendant,

Upon motion of the United States, this Court being advised as to the nature of this case, it is hereby:

ORDERED that pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, counsel for defendant shall not provide defendant with copies of any discovery material produced by the government which contain:

(a) Personal Information: personal identifying information of any individual, including without limitation, any individual's date of birth, social security number, address, telephone number, email address, driver's license number, professional license number, family members' names, or medical information, including mental health or substance abuse information; or

(b) Financial Information: financial information of any individual or business, including without limitation, bank account numbers, credit or debit card numbers, account

passwords, account names and contact information, account history, account balances, account statements, tax return information, or taxpayer identification numbers, unless defense counsel first redacts the Personal Information or Financial Information from the discovery materials or if the Personal Information or Financial Information is the defendant's own information.

IT IS FURTHER ORDERED that defendant is allowed to view the unredacted discovery under the active supervision of defense counsel—that is, the unredacted discovery will be under the custody and control of defense counsel during defendant's review.

IT IS FURTHER ORDERED that neither defense counsel nor defendant shall provide any discovery material produced by the government, whether the material is redacted, to any person not a party to this case without the government's express written permission, except that

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defense counsel may provide discovery material, whether it is redacted, to members of the defense team and to those persons who are necessary to assist counsel in preparation for trial or other proceedings.

Dated: March 25, 2022

HONORABLE MICHAEL H. SIMON
United States District Judge

Presented by:

SCOTT ERIK ASPHAUG
United States Attorney

/s/ Katherine Rykken
KATHERINE RYKKEN, CSB #267196
Assistant United States Attorney

KRISTEN M. CLARKE
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